

REMARKS

The foregoing amendments and the following remarks are responsive to the Final Office Action mailed April 29, 2004. Applicants respectfully request reconsideration of the present application.

Claims 1-13 and 16-52 are pending. No claims have been amended, cancelled, or added.

Examiner rejected claims 1-6, 9-13, 16-48 and 51-52 under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent No. 5,915,112 issued to Boutcher. Examiner rejected claims 7-8 and 49-50 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,915,112 issued to Boutcher in view of U.S. Patent No. 5,928,325 issued to Shaughnessy, et al.

The Examiner, in his Response to Remarks notes:

Applicant's arguments concerning that Boutcher teaches remote procedure calls and not the execution of a driver on a host device are respectfully disagreed upon. To perform operations such as remote procedure calls on a device, it is inherent that the execution of drivers within the remote device will be invoked. Without doing so, operations cannot be performed by computers.

(Final Office Action, page 25)

Applicants respectfully submit that Examiner fundamentally misunderstands what the present invention claims. A remote procedure call is defined as:

A protocol which allows a program running on one host to cause code to be executed on another host without the programmer needing to explicitly code for this. RPC is an easy and popular paradigm for implementing the client-server model of distributed computing. An RPC is initiated by the caller (client) sending request message to a remote system (the server) to execute a certain procedure using arguments supplied. A result message is returned to the caller. There are many variations and subtleties in various implementations, resulting in a variety of different (incompatible) RPC protocols.

Free On-Line Dictionary of Computing (FOLDOC),

<http://foldoc.doc.ic.ac.uk/foldoc/foldoc.cgi?Remote+Procedure+Call>

Thus, the purpose of a remote procedure call is to provide arguments, for executing a procedure already on the system. Remote procedure calls do not send an executable or driver to another system, but rather invoke an existing executable or driver.

Applicants respectfully submit that remote procedure calls are in no way equivalent to transmitting an executable file or a device driver to a host device. Remote procedure calls enable the execution of a program on another host, without the need to send the program itself, by sending only the arguments. Basically, the client system sends a request message, in a format defined by known protocols, with a return path defined for the results. Installing device drivers implies that the host system must become aware of the input and output mechanisms of the hardware component, as this is what the driver controls. The point of remote procedure calls is to eliminate the need for specific drivers or command information. Therefore, Boutcher teaches away from installing a driver, as recited in the present application.

Furthermore, the use of remote procedure calls, defined by known protocols, specifically teaches away from determining communication information allowing communication between the first device and the second device. The remote procedure call requires "client stub" or "server stub" applications on the computer. The protocol describes the exact format of the interaction between the client and server computers. Therefore, a system using remote procedure calls does not need to determine communication information, since that communication information is specified by known protocols.

Therefore, since the use of remote procedure calls, as described by Boutcher, teaches away from determining communication information and using drivers, Applicants respectfully request withdrawal of the rejection over Boutcher.

In view of the foregoing remarks, Applicants respectfully submit that all pending claims are in condition for allowance. Such allowance is respectfully requested.

If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to contact Judith A. Szepesi at (408) 720-8300.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

Date:

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